ALABAMA HAZARDOUS WASTES MANAGEMENT AND MINIMIZATION ACT (AHWMMA)

Compliance Evaluation Inspection (CEI) Report

1) Author of Report

Bailee Dykes
Environmental Scientist
Compliance and Enforcement, Industrial Hazardous Waste Branch
Alabama Department of Environmental Management (ADEM)
1400 Coliseum Boulevard
Montgomery, AL 36110

2) Facility Information

Parker Hannifin Corporation (Parker)
1005 A Cleaner Way SW
Huntsville, (Madison County), Alabama 35805

EPA ID Number: ALR000005884
NAICS Code(s): 332721

3) Responsible Official(s)

Mr. Bobby Edwards – EHS Coordinator
Telephone: 256-213-4005
Email: [HYPERLINK "mailto:bedwards@parker.com"]

4) Inspection Participant(s)

Mr. David Manning, Lab Test Specialist – Parker
Mr. Tim Geisenhoff, Electrician – Parker
Mr. Fred Clemmons, Manufacturing Supervisor – Parker
Ms. Paula Whiting, Environmental Engineer – U.S. Environmental Protection Agency
Ms. Bailee Dykes, Environmental Scientist – ADEM

5) Date of Inspection

March 13, 2017

6) Applicable Regulations

ADEM Administrative Code Division 335-14, Hazardous Waste Program Regulations

ADEM

7) **Purpose of Inspection**

The purpose of this inspection was to determine compliance with all applicable requirements of the Hazardous Waste Program regulations.

8) **Facility History & Description**

Parker, a manufacturer of instrumentation connectors, has been in operation at its current location since May 1997. The Huntsville plant manufactures small instrumentation fittings (below 1/2") that are used in instrumentation valves, skids, tubing, and oil and gas industries. Various materials are used to manufacture these fittings including stainless steel, brass, and some exotics such as hastelloy and monel. Stainless steel is about 85% of the volume with brass about 10% and exotics the rest. The approximate 58,000 square foot facility operates two eight hour shifts five days a week. Parker currently employs 75 people (40 of whom are office/salary employees and 35 employees working in the manufacturing area). The facility last submitted a *Notification of Regulated Waste Activity* (ADEM Form 8700-12, received by the Department on March 28, 2016) identifying itself as a small quantity generator of hazardous waste, used oil generator, and a small quantity generator of hazardous waste.

9) **Observations**

At approximately 12:30 p.m. a representative of the U. S. Environmental Protection Agency (Ms. Whiting), and I hereinafter "we" or "us" arrived at the facility and were issued visitor badges for entrance to the plant. We were then greeted by Mr. Manning. At that time, we identified ourselves and explained the purpose of the inspection. Following the opening conference, Mr. Manning guided us on a walk-through inspection of the facility, noting the following areas:

Metals Laboratory

First, Mr. Manning escorted us through the metals laboratory where the products are tested. In this area, waste acid is generated. Everything used in the lab area is poured down the sink and sent to the on-site wastewater treatment unit. No areas of concern were noted in the Metals Laboratory.

Production Area

Next, we were escorted through the production area where parts are manufactured. In this area we first observed a Better Engineering URL Parts Washer (see Photograph #1) used to clean various parts before they are processed. According to Mr. Manning, the waste generated in the parts washer is not sent to the on-site wastewater treatment unit. Next to the parts washer, we observed the brass bright dip line and the passivation line (see Photograph #2 and #3). The brass bright dip line is for the appearance of the brass and there is no material added to the products. It produces a shiny end result and removes any minor corrosion that may be present. The line contains a couple of water rinse tanks, a peroxide tank, a soap tank and a caustic tank to produce the desired result. The passivation line is used for the stainless steel products. It contains a tank of citric acid and two water rinse tanks.

Next, we were escorted to the water jet located in the production area. In this area, we observed a Mitsubishi Electric MC Machinery Systems, Inc. water jet that contains red garnet sand. The sand is stored in a metal hopper, then fed through the water jet where water and sand is sent through at a high pressure to cut metal parts. According to Mr. Manning, the red garnet sand is non-hazardous, but a hazardous waste determination has not been conducted.

Next, we were escorted to three yellow fireproof metal cabinets that were staged along a wall in the production area. Each cabinet was locked and located inside each cabinet was a 55-gallon drum containing used oil absorbents (see Photograph #4). The drums were all labeled with the words "Used Oil" (see Photograph #5), but none of the drums were closed. All three of the drums were closed at the time of the inspection. In the same area, we observed a one quart container labeled with the words "Used Water & Oil" located underneath a coolant oil skimmer. The container was open at the time of the inspection (see Photograph #6).

Next, we were escorted to a belt sander station that had a dry vac connected to the sander for collecting metal chips (see Photograph #7). At the time of the inspection, there was a metal dust mixture from the sander on the floor (see Photograph #8). According to Mr. Manning, the metal chips are sent out for recycling and a hazardous waste determination has not been conducted on the metal chips.

Oil Room

Next, we were escorted to the oil room which is located next to the production area. In this area, we observed a mop machine, mop bucket, and one used oil collection tank. According to Mr. Manning, the mop bucket is used in cleaning areas where the mop machine cannot access. The mop bucket was not labeled with the words "Used Oil" (see Photograph #9). The approximate 70 gallon used oil collection tank was labeled with the words "Used Oil", but not closed (see Photograph #10). The used oil collection tank was closed at the time of the inspection.

Chip Processing Shed

Next, we were escorted outside to the chip processing area that consisted of a metal corrugated shed. Under the shed, metal chips are stored and segregated by material type. The shed also contained several empty drums (see Photograph #11). No areas of concern were noted at the chip processing shed at the time of the inspection.

Next, we were escorted to an area outside the facility where the used red garnet sand is stored. In this area, we observed 12 super sacks of used red garnet sand (see Photograph #12). According to Mr. Manning, the sand is non-hazardous, but is picked up by a hazardous waste transporter. A hazardous waste determination has not been determined on the sand.

Oil Shed

Next, we were escorted to the oil shed that consisted of a metal corrugated shed located behind the chip

processing shed. In this area, we observed a 10,000 gallon used oil storage tank (see Photograph #13). The tank was equipped with a secondary containment system and labeled with the words "Used Oil". Next to the used oil storage tank we observed three 5-gallon containers and one small pan containing used oil (see Photograph #14 and #15). The containers were open and not labeled with the words "Used Oil".

Wastewater Treatment Unit

Next, we were escorted to the wastewater treatment unit area (see Photograph #16). The wastewater treatment unit is a microfiltration unit and is only in operation once or twice a week due to the low flow of material coming in. The main use of the unit is for minor pH adjustments. In this area, we observed the hazardous waste sludge press with a fiber board container underneath the press covered in plastic (see Photograph #17). According to Mr. Manning, the container was covered with the plastic due to the room being hosed down and cleaned once a month. Underneath the plastic, the container was labeled with the words "Hazardous Waste", "F006 Metal Hydroxide", and dated "2/3/17". According to daily logs that Mr. Manning keeps, the sludge dryer was emptied on "2/3/17".

Universal Waste Storage Area

Next, we were escorted to the mezzanine where the universal waste is stored. In this area, we observed seven 4ft cardboard boxes of spent fluorescent lamps and one 8ft cardboard box of spent fluorescent lamps. Three of the boxes were not marked with accumulation start dates, two of the boxes were not labeled with the words "Universal Waste", and all of the containers were open (see Photograph #18 and #19).

Battery Recycler Center

Last, we were escorted to the universal waste storage for batteries. In this area, we observed a ½ gallon container of NiCd batteries that were open and marked with an accumulation start date of "12/14/15" (see Photograph #20), a ½ gallon container of Nickel Metal Hydride batteries that were closed and marked with an accumulation start date of "4/20/16" (see Photograph #21), and a 3.5 gallon container of Lithium Ion batteries that were closed and marked with an accumulation start date of "10/6/15" (see Photograph #22). All of the containers were labeled with the words "Hazardous Waste".

Records Review

After the walk-through inspection of the facility, we asked to review the following documents required by Division 14 of the ADEM Administrative Code:

- Hazardous waste shipping manifests for the last three years
- Universal waste shipping manifests for the last three years
- Used oil shipments for the last three years
- Training records of employees who manage hazardous waste
- Weekly inspection logs of the 180-day hazardous waste container storage area
- Contingency Plan/Emergency Plan

- Emergency Contact Numbers posted

As a result of the records review, the following items were noted:

1. Hazardous wastes (F006) are transported by Univar USA Inc. (GAD980845077), and EQ Industrial Services (MIK435642742) to EQ-Michigan Disposal (MID000724831) for storage/treatment.
2. Non-hazardous neutralized citric acid and red garnet sand are transported by Spectra (TNR000005439) and Univar USA Inc. (GAD980845077) to Clean Earth of Alabama (ALD981020894) and VLS Armor, LLC (TND981920119).
3. The Emergency Coordinator list has employees designated as Emergency Coordinators that are no longer employed with the facility.
4. No documentation of used oil shipments were available for review at the time of the inspection.
5. The weekly hazardous waste inspection logs need to be updated to include the number and capacity of containers.

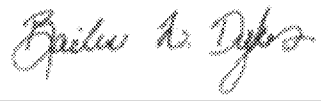
Summary

This inspection was performed to determine the facility's compliance with all applicable requirements of Division 14 of the ADEM Administrative Code. During the inspection, the following areas of concern or potential noncompliance were noted:

1. Three 55-gallon drums containing used oil absorbent rags were not closed. All of the drums were closed during the inspection;
2. One quart container holding used oil staged underneath a coolant oil skimmer was not closed;
3. One 70 gallon used oil collection tank was not closed. The collection tank was closed during the inspection;
4. Mop bucket used in cleaning used oil was not labeled with the words "Used Oil";
5. Three 5-gallon containers and one small pan staged in the Oil Shed containing used oil were not closed or labeled with the words "Used Oil";
6. Seven boxes of 4ft used fluorescents lamps and one 8ft box of used fluorescent lamps were open;
7. Three boxes of used fluorescent lamps were not marked with an accumulation start date and two boxes of used fluorescent lamps were not labeled;
8. One half gallon container of NiCd batteries dated "12/14/15" and one 3.5 gallon container of lithium ion batteries dated "10/6/15" were stored longer than the allowed year;
9. Emergency Coordinator list has employees designated as Emergency Coordinators that are no longer employed with the facility;
10. Emergency contact numbers were not posted
11. Weekly inspection logs of the hazardous waste storage area need to be updated to include the number and capacity of containers;
12. No documentation of used oil shipments were available for review at the time of the inspection; and
13. No hazardous waste determinations on the red garnet sand and the dry vac containing the mixed metal dust.

Following the records review, we conducted a closing conference with Mr. Manning to discuss our observations. At the conclusion of the closing conference, I prepared a *Preliminary Inspection Report*, indicating observations noted during the inspection. Mr. Manning reviewed, signed, and accepted the report on behalf of Parker. We concluded the closing conference and departed the site at approximately 5:00 pm.

10) Signed



Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

3/24/2017
Date

11) Concurrence

Brent A. Watson, Chief
Compliance and Enforcement Section
Industrial Hazardous Waste Branch
Land Division

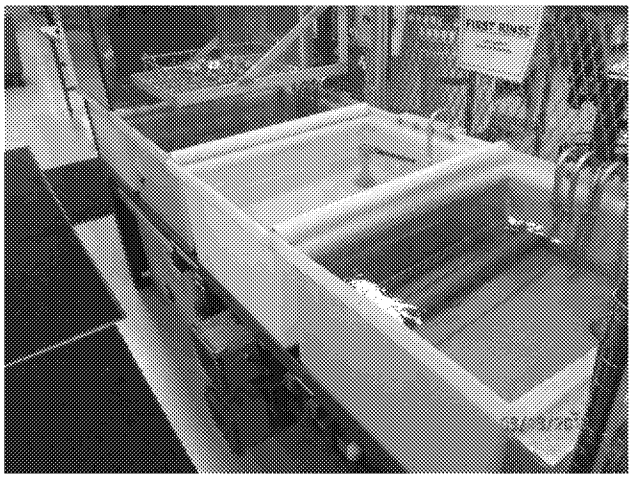
3/24/2017
Date

ADEM

PHOTO LOG

Photograph # 1: Production Area – parts washer

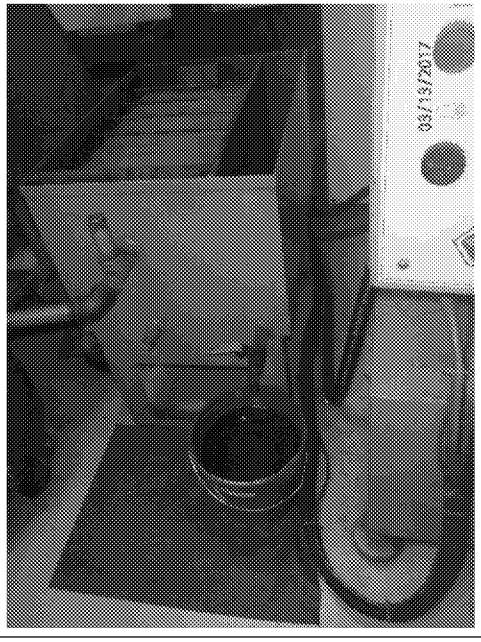
Photograph#2: Production Area – Brass Bright Dip Process



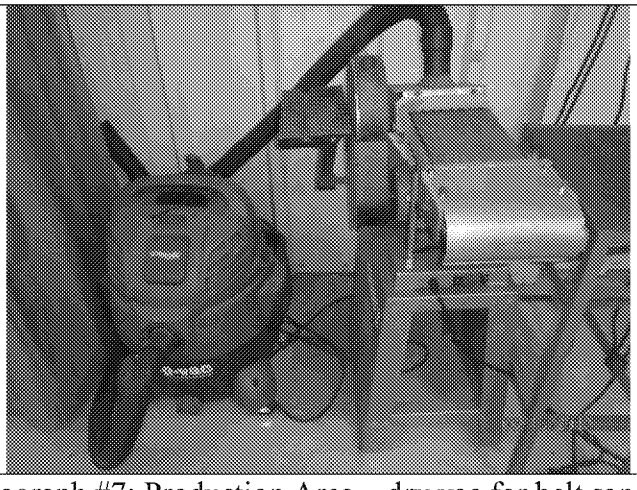
Photograph #3: Production Area – Passivation Line

Photograph #4: Production Area – used oil absorbents

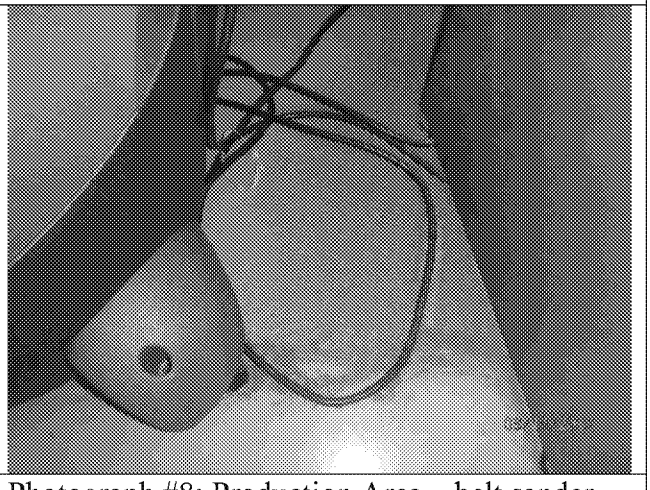
Photograph #5: Production Area – used oil absorbent drum



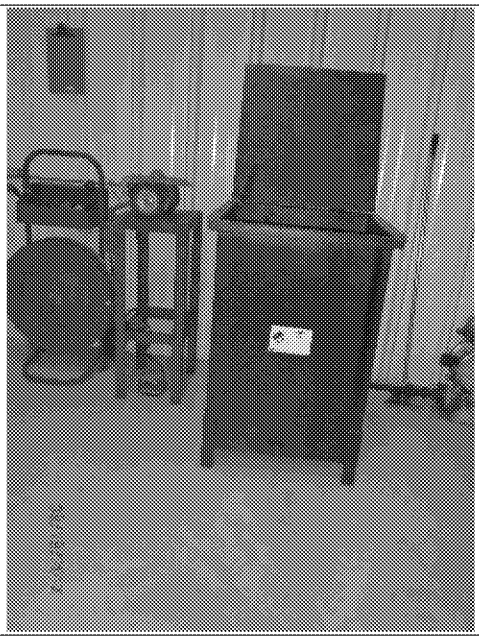
Photograph #6: Production Area – coolant oil skimmer with used oil/water container

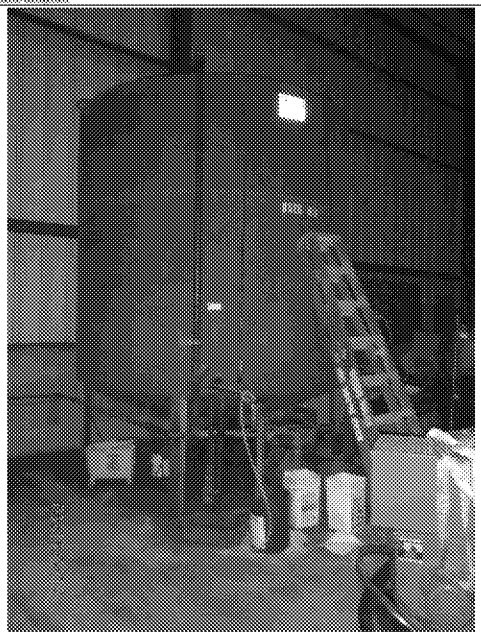


Photograph #7: Production Area – dry vac for belt sander



Photograph #8: Production Area – belt sander with mixed metal/sand dust on the floor

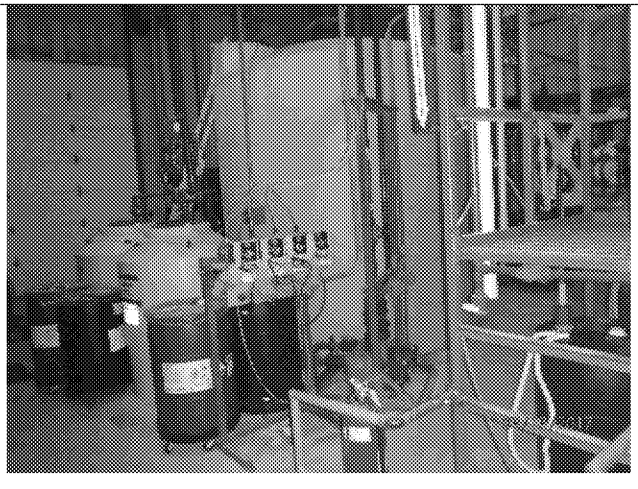
	
Photograph #9: Oil Room – used oil mop bucket	Photograph #10: Oil Room – 70-gallon used oil collection tank
	
Photograph #11: Chip Shed	Photograph #12: Used red garnet sand for disposal



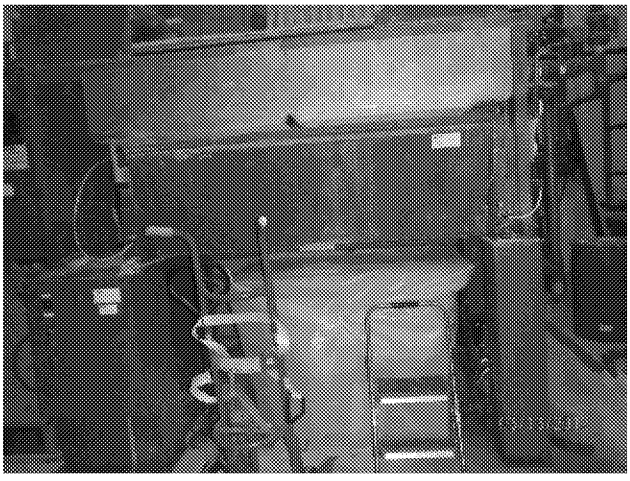
Photograph #13: Oil Shed – Used Oil Tank

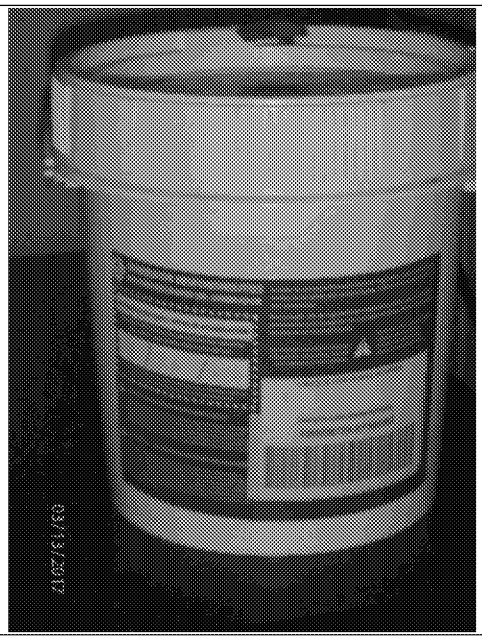
Photograph #14: Oil Shed – Used, open, and unlabeled oil containers

Photograph #15: Oil Shed – Used, open, and unlabeled oil containers



Photograph #16: Wastewater Treatment Area

	
Photograph #17: Wastewater Treatment Area – hazardous waste sludge press and fiber board container	Photograph #18: Universal waste lamp storage
	
Photograph #19: Universal waste lamp storage	Photograph #20: Universal waste nickel cadmium batteries

	
Photograph #21: Universal waste nickel metal hydride batteries	Photograph #22: Universal waste lithium ion batteries